

John R. Harrison
Attorney at Law Cal. Lic. 88701
P.O. Box 601611
Sacramento, CA 95860
Phone (916) 524-9316
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION

IN RE: TECSON, NAPOLEON L.

CASE NO: 2010-21742

MOTION TO COMPEL ABANDONMENT OF
PROPERTY OF THE ESTATE

Debtor

DCN: JRH-1

Judge: Christopher M. Klein
Date: March 30, 2010
Time: 9:30 AM
Place: 501 I Street, 6th Floor,
Courtroom 35, Sacramento CA

MOTION TO COMPEL ABANDONMENT OF PROPERTY OF THE ESTATE

NAPOLEON L. TECSON ("Debtor") hereby moves this Court for an
Order Granting Debtor's MOTION TO COMPEL ABANDONMENT OF PROPERTY OF
THE ESTATE based upon the following grounds:

1. The Chapter 7 bankruptcy case filed by the Debtor on
January 10, 2010 complies with existing law.
2. Debtor owns and operates a small "oil change" automobile
service shop, known as "All Tune & Lube", located at 707 Davis
St. #G, Vacaville, CA 95687. This business has no marketable
value outside of the Debtor's own efforts. The equipment and
bank accounts needed to operate the business are listed and

1 exempted on Schedules B and C of Debtor's bankruptcy petition.
2 The business is the Debtor's main occupation at the present
3 time. The Debtor has invested substantial resources, time, and
4 energy in this business and, because of this investment,
5 wishes to keep operating at the present time. If the Debtor
6 ceases operations, even for a short time, he will surely lose
7 clientele, making it impossible to reopen and maintain its
8 required operating expenses.

9 3. The business, All Tune & Lube, owned and operated by the
10 Debtor, including all bank accounts and inventory, has a
11 liquidation value of approximately \$9,785.00, which is fully
12 exempted pursuant to California Code of Civil Procedure,
13 Sections 703.140(b) (5) .

14 4. The equity in the property is exempted pursuant to C.C.P.
15 Sections 703.140(b) (5) and 703.140(b) (6) as set forth in
16 Debtor's Schedule C, which is filed concurrently herewith in
17 the List of Exhibits.

18 5. As the property is exempted and protected and is of
19 inconsequential value to the bankruptcy estate, there is
20 nothing for the Trustee to administer to unsecured creditors.
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22 DATED: February 26, 2010
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25 /s/ John R. Harrison
26 John R. Harrison
27 Attorney for Debtor
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